

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMERISURE INSURANCE COMPANY and)
AMERISURE MUTUAL INSURANCE)
COMPANY,)

Plaintiffs,)

vs.)

PREMIER DESIGN & BUILD GROUP, LLC,)
and PREMIER DESIGN & BUILD)
NATIONAL, LLC,)

Defendants.)

PREMIER DESIGN + BUILD GROUP, LLC,)
and PREMIER DESIGN + BUILD)
NATIONAL, LLC,)

Defendants/Counter-Plaintiffs.)

vs.)

AMERISURE INSURANCE COMPANY and)
AMERISURE MUTUAL INSURANCE)
COMPANY,)

Plaintiffs/Counter-Defendants.)

No. 1:23-cv-04098

Honorable Sara L. Ellis
Magistrate Judge Young B. Kim

NOTICE OF MOTION

Please take notice that on **Tuesday, January 28, 2025, at 9:45 A.M.** or as soon thereafter as we may be heard, we shall appear before The Honorable Judge Sara L. Ellis, or any judge sitting in her stead, in Courtroom 1403 of the United States District Court for the Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, Illinois, and present Plaintiffs Amerisure Insurance Company and Amerisure Mutual Insurance Company's **Motion for Leave to File Second Amended Complaint for Declaratory Judgment [D.E. 139]**.

Dated: January 20, 2025

Plaintiffs Amerisure Insurance Company and
Amerisure Mutual Insurance Company

By: /s/ Donald E. Elder
Emerson & Elder, P.C.

Donald E. Elder
Illinois State Bar No. 6255889
Brett L. Warning
Illinois State Bar No. 6199057
Emerson & Elder, P.C.
53 West Jackson Blvd.
Suite 526
Chicago, IL 60604
Tel: (312) 519-8975
Fax: (312) 265-1603
Email: dee@emersonelder.com
Email: brett@emersonelder.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 20, 2025, a true and correct copy of the foregoing document has been furnished electronically to all counsel of record via the Court's CM/ECF system.

/s/ Donald E. Elder .

Donald E. Elder (IL ARDC #6255889)
Emerson & Elder, P.C.
53 West Jackson Boulevard, Suite 526
Chicago, Illinois 60604
Telephone: (312) 520-2502
Facsimile: (312) 265-1603
E-mail: dee@emersonelder.com
*Attorney for Plaintiffs/Counter-Defendants
Amerisure Insurance Company and
Amerisure Mutual Insurance Company*